

1 THE HONORABLE MARSHA J. PECHMAN
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
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14 COINLAB, INC., a Delaware Corporation,
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16 Plaintiff,

v.

17 MT. GOX KK, a Japanese corporation, and
18 TIBANNE KK, a Japanese corporation,
19
20 Defendants.

21 Case No. 2:13-cv-00777-MJP
22
23

**DEFENDANTS' UNOPPOSED MOTION
TO AMEND STIPULATED
PROTECTIVE ORDER (DKT. NO. 26)**

**NOTE ON MOTION CALENDAR:
Friday, January 17, 2014**

24 **I. INTRODUCTION**

25 Defendants Mt. Gox KK (“MtGox”), and Tibanne KK (“Tibanne”), provided Plaintiff
26 with a copy of this motion prior to presenting it to the Court. Plaintiff’s counsel told
27 Defendants’ counsel that Plaintiff CoinLab, Inc. (“CoinLab”) would not oppose the motion.
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29 **II. RELIEF REQUESTED**

30 In order to address the designation and treatment of deposition testimony that a party
31 claims should be designated as “HIGHLY CONFIDENTIAL -- ATTORNEYS’ EYES
32 ONLY” Defendants MtGox and Tibanne move for entry of an order amending the Stipulated
33 Protective Order (Dkt. No. 26) entered on November 14, 2013.
34

35 *Defendants’ Unopposed Motion to Amend Stipulated
36 Protective Order(Dkt. No. 26) (2:13-cv-00777-MJP) - 1*

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1 Specifically, the Stipulated Protective Order (Dkt. No. 26) should be amended by
2 adding the following Paragraph 6.2(e) at page 6, line 22:

3 “(e) At a deposition a party or its attorney can designate testimony as
4 “HIGHLY CONFIDENTIAL -- ATTORNEYS’ EYES ONLY”. If the other party or
5 its attorney disagrees to such designation, the designating party has 14 days to file a
6 motion for protective order to continue such designation and all persons will treat the
7 testimony as “HIGHLY CONFIDENTIAL -- ATTORNEYS’ EYES ONLY” until the
8 Court rules on such motion, and will continue to so treat it as “HIGHLY
9 CONFIDENTIAL -- ATTORNEYS’ EYES ONLY” in the event the Court grants the
10 motion. If the designating party does not file such a motion within said 14 days the
11 designated testimony will be deemed to be designated as “CONFIDENTIAL” as of the
12 end of such 14 day period and will be so treated by the parties. If a party or its
13 attorney designates testimony as “HIGHLY CONFIDENTIAL -- ATTORNEYS’
14 EYES ONLY” all representatives of any adverse or non-related party, or any other
15 person (other than each party’s counsel of record, videographer, court reporter and
16 interpreters (if any)) shall be excluded from the deposition room during the giving of
17 the “HIGHLY CONFIDENTIAL -- ATTORNEYS’ EYES ONLY” testimony.”

22 The Defendants submit that this is a reasonable and necessary amendment to the Stipulated
23 Protective Order to fulfill its purpose.

III. CONCLUSION

For the foregoing reasons, this Court should grant this unopposed motion to amend the
Stipulated Protective Order.

Respectfully submitted this 7th day of January, 2014.

HILLIS CLARK MARTIN & PETERSON P.S.

By s/ Louis D. Peterson

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of December, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED this 7th day of December, 2013 at Seattle, Washington.

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